### IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:	§	Chapter 11 (Subchapter V)
	§	
FREE SPEECH SYSTEMS, LLC	§	Case No. 22-60043 (CML)
,	§	,
Debtor.	§	
	§	
In re:	§	
	§	Chapter 11
ALEXANDER E. JONES,	§	•
,	§	Case No. 22-33553 (CML)
Debtor.	§	` ,

# DEBTOR ALEXANDER E. JONES'S CROSS-NOTICE OF 2004 SUBPOENA TO TESTIFY AT A DEPOSITION

Debtor Alexander E. Jones ("Jones"), by and through undersigned counsel, submits this cross-notice to the *Notice of Rule 2004 Subpoena to Testify at a Deposition*<sup>1</sup> of Charlie Cicack (the "Examinee") and the *Joinder of the Official Committee of Unsecured Creditors of Alexander E. Jones to the Notice of Rule 2004 Subpoena to Testify at a Deposition*<sup>2</sup> of the Examinee (collectively, the "Rule 2004 Notices"), and will participate in the examination of the Examinee on May 17, 2023 at 10:30 a.m. Pacific Time, at the law firm of Akin Gump Strauss Hauer & Felt LLP, 1999 Avenue of the Stars, #600, Los Angeles, CA 90067. The examination will continue from day-to-day until completed. Jones hereby joins the Rule 2004 Notices, and will examine the Examinee on the topics in the attached Exhibit A.

<sup>&</sup>lt;sup>1</sup> See In re Free Speech Systems, LLC (the "<u>FSS Case</u>"), Case No. 22-60043 (CML), filed May 8, 2023 in the United States Bankruptcy Court for the Southern District of Texas (Doc. No. 587).

<sup>&</sup>lt;sup>2</sup> See the FSS Case, filed May 10, 2023 (Doc. No. 588); see also In re Alexander E. Jones, Case No. 22-33553 (CML), filed May 10, 2023 in the United States Bankruptcy Court for the Southern District of Texas (Doc. No. 267).

Dated: May 16, 2023

#### **CROWE & DUNLEVY, P.C.**

By: /s/ Vickie L. Driver
Vickie L. Driver
State Bar No. 24026886
Christina W. Stephenson
State Bar No. 24049535
2525 McKinnon St., Suite 425
Dallas, Texas 75201

Telephone: 737-218-6187

Email: dallaseservice@crowedunlevy.com

ATTORNEYS FOR DEBTOR ALEXANDER E. JONES

#### **CERTIFICIATE OF CONFERENCE**

I	certify that on I	May 1, 2023	I conferred	with c	counsel f	for the	Examinee,	Walter (	Cicack
regardin	g this Cross-Noti	ice of 2004 E	xamination	of Cha	ırlie Cica	ack, and	l counsel w	as not op	posed

/s/ Vickie L. Driver
Vickie L. Driver

## **CERTIFICATE OF SERVICE**

I certify that on May 16, 2023, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Vickie L. Driver
Vickie L. Driver

#### **EXHIBIT A**

The deposition examination will relate to the following topics:

- 1. The acts, conduct, property, transactions, liabilities, and financial condition of Free Speech Systems, LLC and Alex Jones.
- 2. Your business dealings, if any, with Free Speech Systems, LLC, Alex Jones, and/or any associated persons or entities.
- 3. Any matters in which you are involved affecting the administration of either of the Debtors' estates.
- 4. The operation of Free Speech Systems, LLC, including the source of any money or property acquired or to be acquired by Free Speech Systems, LLC and the consideration given or offered therefor.
- 5. Alex Jones, including the source of any money or property acquired or to be acquired by Alex Jones and the consideration given or offered therefor.
- 6. Any other matter relevant to the case or the formation of a plan.